

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 06-0169 MMC
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
v.)	ORDER EXEMPTING SPECIFIED
)	DOCUMENTS FROM PROTECTIVE
ALAN BRUCE MEGLEN,)	ORDER
a/k/a Jack Meglen,)	
)	
Defendant.)	
_____)	

At the outset of this case the parties stipulated to a protective order regarding discovery, and the Court entered that order.

The parties now represent that included within the original protective order are non-sensitive materials that relate to the routine investigation of this matter.

AFPD Kalar requests that these materials be exempted from the protective order, and that he be allowed to provide copies of certain materials (specified below) to his client to review outside the presence of his attorney and to otherwise disseminate those materials as appropriate to the investigation of this matter. AUSA Rees has no objection to this request.

Therefore, for good cause shown, the original stipulated protective order is hereby modified. AFPD Kalar may copy, provide to his client, and otherwise appropriately disseminate discovery provided by the government from Bates ABM0001-ABM0048, Bates ABM0067-ABM0081, and

1 Bates ABM0200-ABM0250. The remaining discovery and digital media provided by the
2 government to AFPD Kalar remains under the original protective order.

3
4
5 August 11, 2006

6 Dated



HON. MAXINE M. CHESNEY
United States District Court Judge

7 IT IS SO STIPULATED.
8
9

10 DATED

/s

KEVIN V. RYAN
United States Attorney
Northern District of California
ROBERT REES
Assistant United States Attorney

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12
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14 DATED

/s

BARRY J. PORTMAN
Federal Public Defender
Northern District of California
STEVEN G. KALAR
Assistant Federal Public Defender